

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FLORIDA GIFT FRUIT SHIPPERS ASSOCIATION
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS RALPH J. MODEN, USPS-T-4

September 16, 1997

Florida Gift Fruit Shippers Association (FGFSA) hereby submits the attached interrogatories to USPS Witness Moden (USPS-T-4) and requests a timely and full response under oath.

Florida Gift Fruit Shippers Association

By 

M. W. Wells, Jr.

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Interrogatories to Witness Moden, USPS-T-4

FGFSA/USPS-T4-1

Provide the "standard conversion factors for each operation", which you refer to on page 19 of your testimony.

a) Provide the source and date of development for each.

FGFSA/USPS-T4-2

In the manual sortation of non-machinable parcels, to what extent are the productivities changed by the use of the Small Parcel and Bundle Sorter (SPBS) and the SPBS Feed System (see description of those items in LR-H-10)

FGFSA/USPS-T4-3

To what extent is the Linear Parcel Sortation System currently in use, and what is the expected implementation of the acquisition of additional equipment? When will it be available and in use at all BMC's?

FGFSA/USPS-T4-4

On page 20 of your testimony you refer to "many of the packages are poorly wrapped". To what extent are these poorly wrapped parcels presented to the Postal Service by mailers using DBMC rates?

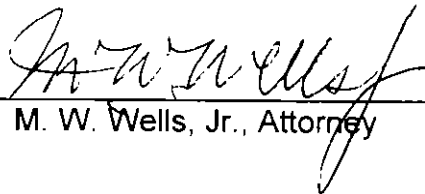
FGFSA/USPS-T4-5

Refer to your testimony at page 21. To what extent is the need to staff manual sorting operations to handle "late surges" to meet service commitments due to the Parcel Post mail? Is the late surge of parcel post mail deferrable to the following day, without creating an inability to meet service commitments for that mail?

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in this proceeding on this date in accordance with Section 12 of the Rules of Practice and Procedure.

Dated : September 16, 1997



M. W. Wells, Jr., Attorney